

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiff,

v.

Civil No.: 1:16cv563-TSE-TCB

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

MOTION FOR SUMMARY JUDGMENT

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively “Defendants”), by counsel, pursuant to Fed. R. Civ. P. 56 respectfully move this Court for summary judgment on all counts of Plaintiffs’ Complaint with prejudice and for such other relief as the Court deems just and proper. Concurrently herewith, Defendants have filed a supporting memorandum of points and authorities. A proposed Order is attached.

Local Rule 7(E) Certification

Defendants’ counsel attempted to confer in good faith with counsel for Plaintiffs regarding this Motion but counsel were unable to reach agreement.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

mdingman@reedsmith.com

jdebettencourt@reedsmith.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of November, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Michael S. Dingman (VSB No. 30031)
Justin deBettencourt (VSB No. 83806)
7900 Tysons One Place
Suite 500
McLean, Virginia 22102
(703) 641-4200 (Telephone)
(703) 641-4340 (Facsimile)
mdingman@reedsSmith.com
jdebettencourt@reedsSmith.com